

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 1:18 CR 513
	)	
Plaintiff,	)	JUDGE CHRISTOPHER A. BOYKO
	)	
vs.	)	<b><u>DEFENDANTS UNOPPOSED</u></b>
	)	<b><u>MOTION TO PERMIT TRAVEL</u></b>
TREVOR C. MARLYNE,	)	
	)	
Defendant.	)	

Now comes the Defendant, Trevor C. Marlyne, by and through undersigned counsel, Eric F. Long, Friedman & Nemecek, L.L.C., and hereby respectfully moves this Honorable Court to issue an order permitting Mr. Marlyne to travel outside of the State of Ohio, and, Northern District of Ohio, respectively, for purposes of accompanying his partner, Dr. Alexandra Radu on an employment related trip to Minot, North Dakota. Specifically, Dr. Radu is completing her final year of residency as an oral maxillofacial surgeon and has received a job opportunity in Minot, North Dakota with Trinity Health. Dr. Radu has accepted this position and will be moving to North Dakota in June, 2019. To the extent that he is permitted, Mr. Marlyne intends on joining her on a permanent basis. In anticipation of their move, Dr. Radu and Mr. Marlyne have coordinated with Dr. Radu's hospital to travel to Minot, North Dakota from April 2, 2019 through April 6, 2019 to look for housing<sup>1</sup>.

Defendant has discussed the travel plans with his U.S. Pretrial Service Officer, Mr. LaVecchia, and was advised that Mr. LaVecchia has no objections to this travel. Furthermore, Assistant United States Attorney, Aaron Howell, has no objection to the instant request.

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<sup>1</sup> Details pertaining to Mr. Marlyne's travel plans, are attached hereto as Exhibit "A."

**WHEREFORE**, the Defendant, Trevor Marlyne respectfully requests that this Honorable Court modify the terms of his Court Supervised Released by permitting him to travel outside of the State of Ohio, and, the Northern District of Ohio, for the reasons stated herein.

Respectfully submitted,

/s/ Eric F. Long

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ERIC F. LONG (0093197)

Counsel for Defendant

Friedman & Nemecek, L.L.C.

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion was filed by CM/ECF on the 1<sup>st</sup> day of April 2019, which will send a notification of such filing electronically to the following:  
Assistant United States Attorney, 801 West Superior Avenue, Cleveland, Ohio 44113.

Respectfully submitted,

/s/ Eric F. Long  
ERIC F. LONG  
Counsel for Defendant

**Eric Long**

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**From:** Trevor Marlyne <tmarlyne@icloud.com>  
**Sent:** Monday, March 18, 2019 1:01 PM  
**To:** Eric Long  
**Subject:** Fwd: Trinity Health Visit - Minot

Hello!

I hope you had a good St Patrick's Day! Here's the trip information.

Sent from my iPhone

Begin forwarded message:

**From:** Alexandra Radu <axr576@case.edu>  
**Date:** March 18, 2019 at 12:57:35 PM EDT  
**To:** "tmarlyne@icloud.com" <tmarlyne@icloud.com>  
**Subject:** Fwd: Trinity Health Visit - Minot

----- Forwarded message -----

**From:** Shar M. Grigsby <Shar.Grigsby@trinityhealth.org>  
**Date:** Mon, Mar 18, 2019 at 12:23 PM  
**Subject:** Trinity Health Visit - Minot  
**To:** Alexandra Radu <axr576@case.edu>

Good Morning! Below is your e-ticket for air travel to Minot. I have reserved a car for you at **Hertz** and a room at the **Sleep Inn & Suites** with Confirmation #636091690

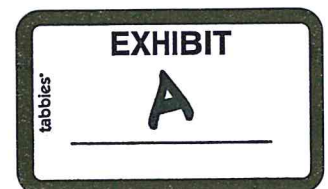
If you need anything further at this time, please be sure to let me know. We will have a "pre-orientation" schedule (for a small portion of your trip) ready for you in the next couple of days.

**Shar Grigsby, FASPR, CMSR**

**Physician Recruiter**  
Trinity Health  
701-857-7860

20 Burdick Expressway West, Minot, ND 58701

[trinityhealth.org](http://trinityhealth.org)





*Trinity Health is an EEO/AA/Female/Minority/Vet/Disabled Employer*

**From:** Jessica Donamaria - Preferred Travel [mailto:[jessica.preferred@midconetwork.com](mailto:jessica.preferred@midconetwork.com)]  
**Sent:** Wednesday, March 06, 2019 2:57 PM  
**To:** Shar M. Grigsby <[Shar.Grigsby@trinityhealth.org](mailto:Shar.Grigsby@trinityhealth.org)>  
**Subject:** Radu View Your Itinerary: April 02, 2019

Here you go!



## Thank You

Your trip has been booked. To see the details of your trip please click the "View Your Itinerary" button below.



**VIEW YOUR ITINERARY**



**Tue, Apr 02, 2019 - Cleveland (CLE) to Minneapolis (MSP) - Confirmed**



### Delta Air Lines 2911

Confirmation Number:GSNGWB



DEPART

**6:45**

AM  
CLE

Non Stop

2H 13M

ARRIVE

**7:58**

AM  
MSP



**Tue, Apr 02, 2019 - Minneapolis (MSP) to Minot (MOT) - Confirmed**



### Delta Air Lines 3534



Confirmation Number:GSNGWB



 **DEPART** **9:08** **AM** **MSP** **Non Stop** **ARRIVE** **10:58** **AM** **MOT**  
 1H 50M

 **Sat, Apr 06, 2019** - Minot (MOT) to Minneapolis (MSP) - **Confirmed** 

 **Delta Air Lines 3538**  
Confirmation Number:GSNGWB

 **DEPART** **3:00** **PM** **MOT** **Non Stop** **ARRIVE** **4:39** **PM** **MSP**  
 1H 39M

 **Sat, Apr 06, 2019** - Minneapolis (MSP) to Cleveland (CLE) - **Confirmed** 

 **Delta Air Lines 0517**  
Confirmation Number:GSNGWB

 **DEPART** **8:15** **PM** **MSP** **Non Stop** **ARRIVE** **11:10** **PM** **CLE**  
 1H 55M

 **Help**

 **Your Reservation Code: 2B7VZF**








**Phone**

701-852-2345





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Regards,

Alex Radu, DMD